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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA  
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,  
M.H., CECILIA DANIELA GONZÁLEZ  
HERRERA, ALBA CECILIA PURICA  
HERNÁNDEZ, E.R., HENDRINA  
VIVAS CASTILLO, A.C.A., SHERIKA BLANC,  
VILES DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY, and UNITED STATES OF  
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF AHILAN T.  
ARULANANTHAM OF APRIL 2, 2025**

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**DECLARATION OF AHILAN T. ARULANANTHAM**

I, Ahilan T. Arulanantham, if called to testify, would do so as follows:

1. I am one of the counsel of record in this case, *National TPS Alliance (NTPSA) v. Noem*.

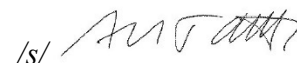
2. Attached as **Exhibit 1** is a true and correct copy of an email I sent to counsel for Defendants on March 31, 2025.

3. Attached as **Exhibit 2** is a true and correct copy of an email exchange between counsel for Defendants and counsel for Plaintiffs, including (among others) Emi MacLean and myself.

4. At some point during the evening of Monday, March 31, 2025 or the early morning of Tuesday, April 1, 2025, I received information from Plaintiff Cecilia Gonzalez Herrera that officials in Orange County, Florida, were apparently refusing to recognize this Court's order postponing the effective date of the vacatur and termination of TPS for Venezuela, for purposes of ensuring that Venezuelan TPS holders in that county could continue to utilize their driver's licenses. As I understand it, the law in that part of Florida (and perhaps elsewhere) makes driver's licenses contingent on valid immigration status. Ms. Gonzalez Herrera expressed concern that this could become a problem for herself and other Venezuelan TPS holders in the area given on-going street-level ICE enforcement in that region. At 8:33 a.m. on the morning of Tuesday, April 1, 2025, Ms. Gonzalez Herrera sent me a picture of an email exchange between some colleagues of hers and an official responsible for driver's license administration in Orange County, Florida, to document the problem. A true and correct copy of that picture is attached hereto as **Exhibit 3**. I also sent it by email to counsel for Defendants on April 1, 2025.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 2nd day of April, 2025, in South Pasadena, CA.

  
Ahilan T. Arulanantham